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April 16, 2024

BY E-FILE AND HAND DELIVERY

The Honorable Jennifer L. Hall
United States District Court of Delaware
844 North King Street
Wilmington, DE 19801

Re: *Sight Sciences, Inc. v. Ivantis, Inc., et al.*
C.A. No.: 21-1317-JLH-SRF

Dear Judge Hall:

Pursuant to the Court's Order on April 11, 2024 (D.I. 447), Plaintiff Sight Sciences, Inc. and Defendants Ivantis, Inc., Alcon Research, LLC, Alcon Vision, LLC, and Alcon Inc. jointly submit the attached list of witness names and glossary of technical terms for the Court Reporter for the upcoming trial beginning on April 22, 2024. The list and glossary are attached as Exhibit A.

Respectfully,

/s/ James L. Higgins

MKS:mg

cc: All Counsel of Record (via CM/ECF and e-mail)
Clerk of the Court (via CM/ECF and Hand Delivery)

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EXHIBIT A

List of Witness Names and Glossary of Technical Terms

Witness Names

Aaron Capsel
Ahmad Hadba
Andres Rivero
Andrew Iwach
Andrew (Andy) Schieber
Angelo Tanna
Arsham Sheybani
Benjamin (Ben) Sather
Brandon Mojica
Brett Trauthen
Cari Stone
Catherine Truitt
Charles Marshall
Chris Phelps
Crawford Downs
Dan Schultz
Daniel O'Keefe
Dave Needleman
Dave Van Meter
David Kimball
David Van Meter
David Y. Badawi
Douglas (Doug) Roeder
James R. Shay
Jasmine Ainetchian
Jason Weems
Jesse Selnick
Jim Rodberg
John C. Galanis
John Jarosz
Joseph Izatt
Karen Becker
Mark Papini
Michael (Mike) Chodsko
Mika Mayer
Paul Badawi
Paul Meyer
Reay Brown
Richard Parrish
Richard Plank
Stephen Kunin
Steven (Steve) McAuley

Timothy (Tim) Buckley
Todd Abraham

Glossary of Technical Terms

ab externo
ab interno
Admedes
anterior chamber
aqueous humor
arcuate member
biocompatible
cadaver eye
cannula
cataract
ciliary bodies
circumferentially
collector channels
cornea
coronary stent
cross-sectional diameter
cylindrical
distal
drug-eluting
dual-radius design
episcleral
fenestration
GEMINI Study
glaucoma
Glaukos Corp. (Glaukos)
Goldmann Equation
heat-set
Helix Microstent (Helix)
HORIZON Study
Hydrus Microstent (Hydrus)
International Patent Publication No. WO 2005/105197 (Lynch-197)
intracanalicular
intraocular pressure (IOP)
longitudinal flow
Memry
microns
minimally invasive glaucoma surgery (MIGS)
Mound Laser and Photonics Center (MLPC)
nickel titanium alloy
nitinol

non-infringing alternatives (NIA)
obviousness-type double patenting (ODP)
occlusion
OMNI Surgical System (OMNI)
ophthalmology
optic nerve
optometry
ovoid
Panduit factors
patency
perfusion
peripheral anterior synechiae (PAS)
POSA
POSITA
postoperative incisional glaucoma filtration surgery
premarket approval
primary Open-Angle Glaucoma
Project Ithaca
prototype
proximal
radial incision
radius of curvature
scaffold
Schlemm's canal
sclera
scleral flap
shape memory alloy
shape memory material
shunt
side interlock release
single-radius design
stent
tangential contact
torus
TRAB360
trabecular meshwork
Transcend
transmural flow
traverse
tri-modal mechanism of action
trough
U.S. Patent No. 6,450,984 (Lynch-984)
U.S. Patent No. 7,186,232 (Smedley)
U.S. Patent Nos. 8,287,482 ('482 Patent)
U.S. Patent No. 9,370,443 ('443 Patent)
U.S. Patent No. 11,389,328 ('328 Patent)

U.S. Patent Publ. No. 2002/0165478 (Gharib-478)
U.S. Patent Publ. No. 2003/0060752 (Gharib-752)
VISCO360
viscodilation
viscoelastic fluid
vitreous cavity

Party Names

Plaintiff

Sight Sciences, Inc.

Defendants

Ivantis, Inc.
Alcon Research, LLC
Alcon Vision, LLC
Alcon Inc.

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Kat Li
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Steven Dirks
Julie Metkus

Trial Technicians (Hot Seat)

Donald (Don) Stump (Plaintiff)
David (Dave) Schlaifer (Defendants)

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